

# California Emergency Management Agency PUBLIC SAFETY AND VICTIM SERVICES DIVISION

3650 SCHRIEVER AVENUE MATHER, CALIFORNIA 95655 (916) 324-9120 FAX: (916) 324-8554



September 15, 2009

Holly Rocket, Clinical Director Amador-Tuolumne Community Action Agency 935 S. Highway 49 Jackson, CA 95642

Re: Grant Award # AT08058527

Dear Ms. Rockett:

On August 11-12, 2009, I conducted a site visit of the Child Abuse Treatment (CHAT) Program operated by Amador-Tuolumne Community Action Agency. Thank you for your time and cooperation during the site visit. It was a pleasure meeting you and the other staff who support the CHAT Program, and seeing your agency in person.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have found the project to be in compliance and functioning within the parameters established in the Grant Award Agreement in most areas. However, there were some findings (out-of-compliance) which require corrective actions. Please send me a corrective action letter by October 15, 2009.

#### PROGRAMMATIC REVIEW

Overall, the Programmatic Review appears to be satisfactory. There are three programmatic issues that need to be addressed:

- Several Operational Agreements (OAs) are missing (Program 4; outdated; see RFA for required OAs) or have end dates missing. <u>Action Required</u>: Since the agency has good working relationships with community agencies and this is the end of the grant period obtain required OAs for the 2009/10 grant year beginning 10/1/09. Provide copies of all OAs, which must include beginning and end dates (can be for three years).
- There is no consistent policy for periodic evaluation of client progress (Program Supplemental 1, see RFA for requirements) in treatment using assessment measures (must be minimum intake/assessment, every 6 months, and at termination).

<u>Action Required</u>: Describe your plan to address this in the correction letter.

Ms. Holly Rockett September 15, 2009 Page Two

3. After reviewing three client redacted files, the diagnosis and treatment plan is not clearly and consistently documented among therapists (included in notes, but not on formal treatment plan).
<u>Action Required</u>: Therapists should use a consistent template for a treatment plan, including DSM number for diagnosis. Goals are too general; they should include activities to reach the goal, a timeline, and treatment modalities utilized. The TheraScribe Treatment Planner book you own has a computer disk with treatment plans. Describe your plan to address this in the correction letter.

## **ADMINISTRATIVE REVIEW**

Overall, the Administrative Review appears to be satisfactory, except for one issue that needs to be addressed:

 Due to deleted staff positions, you need to move funds from savings in Personal Services into Operating Expenses (consultant). If the training cannot be arranged we discussed using the funds to purchase a laptop computer, printer (need computer justification—see website for format), and digital camera. <u>Action Required</u>: You were informed in a previous email a modification needed to be submitted prior to 9/14/09.

Please review the enclosed Site Visit Report form. Please sign the cover page and mail it to me immediately. Complete the requested documentation and return these and a corrective action letter to me by **October 15, 2009.** Should you have questions, please contact me at (916) 323-7425.

Sincerely,

Alan Logan, MSW Program Specialist Children's Section

**Enclosures** 

# CALIFORNIA EMERGENCY MANAGEMENT AGENCY (Cal EMA) CHILD ABUSE TREATMENT (CHAT) PROGRAM PERFORMANCE ASSESSMENT / SITE VISIT REPORT

1. GRANT AWARD NUMBER: AT08058527 DATE OF SITE VIST: 8/11-12/09

2. GRANT PERIOD: 10/1/08 – 9/30/09

3. RECIPIENT/IMPLEMENTING AGENCY:

Amador-Tuolumne Community Action Agency / Same

PROJECT DIRECTOR:

Holly Rockett

(209) 223-1485, Ext. 239

935 S. Highway 49 Jackson, CA 95642

## PERSONS INTERVIEWED DURING SITE VISIT:

NAME	TITLE		<b>AGENCY</b>
Shelly Hance Holly Rockett Patti Cunningham Cheri Cunningham Ross Elliott Denise Combs Lori Weir-Weber	Therapi Deputy Personn		ATCAA ATCAA ATCAA ATCAA Consultant Consultant Consultant
Alan Logan Signature of Program Specialist	09/15/2009 Date	Gillsa Miller Signature of Section C	09/15/2009 Chief Date

Signature of Project Representative

Date

(signing this indicates I have received a copy of this report and read it)

AL	MINISTRATIVE REVIEW			
1.	OPERATIONAL DOCUMENTS	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Re	eview hard copy/verify the ability to access on line:  The Cal EMA Recipient Handbook (R.H.)  The Approved Grant Award Agreement  The RFA/RFP (supersedes the requirement of the R.H.)  The Program Guidelines (supersedes the requirement of the R.H.)  Is the project familiar with Office of Management and Budget,  OMB Circulars which govern your organization? Circulars may be			
Cor	found at www.whitehouse.gov/omb/circulars.			
-				
2.	FIDELTY BOND - COMMUNITY BASED ORGANIZATION (CBO ) ORGANIZATIONS ONLY	& AME	RICA	N INI
•	Obtain copy of required CBO bonding? [R.H. Section 2161] Does not apply to state, city, or county units of government.			
•	Does the bond show: (Certificate of Liability Insurance)  Bonding company name  Bond number  Description of coverage  Amount of coverage (50% of allocation)  Bond period  Grant award number  Bond include Form A (Employee Dishonesty) and Form B (Forgery Coverage)?			
	<ul><li>Is Cal EMA named on the bond as the beneficiary?</li></ul>	$\boxtimes$		
Cor	nments: obtained copy			
3.	ENVIRONMENTAL IMPACT - CEQA COMPLIANCE (R.H. Section	2153)		
•	Does the project have their CEQA documentation on file?			$\boxtimes$
Cor	nments:			
4.	PROOF OF AUTHODITY (D.H. Continue 1250)			
₩.	PROOF OF AUTHORITY (R.H. Section 1350)	K3		_
•	Does the project have a written authorization/resolution on file as required by the Grant Award Agreement? *Ask for copy	$\boxtimes$		
Cor	nments: obtained copy			

	OMINISTRATIVE REVIEW (Continued)			
		<b>YES</b>	NO	N/A
5	ODC ANIZATIONAL CHADT			
5.	ORGANIZATIONAL CHART			
•	Review the organizational chart. Are all budgeted positions identified?	$\boxtimes$		
Cor	nments: deleted advocate position	,	20	
6.	Cal EMA MODIFICATION (Cal EMA 2-223)		ije.	
•	Review the purpose/preparation of Grant Award Modification (Cal EMA 2-223). [R. H. Section 7500] (Instruct the project staff on the procedure to obtain the most recent forms from Cal EMA			
	website.) A modification is needed for the following:			
	o Budget changes			
	o Change in key personnel			
	Adding/changing additional signers			
	o Change goals/objectives, or activities			
	<ul><li>Address change</li><li>Other</li></ul>			
	o Other			
Cor	nments:			
7.	PERSONNEL POLICIES			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]	$\boxtimes$		
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current job duties/descriptions			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current job duties/descriptions  O A current Drug Free Workplace policy statement on file			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current job duties/descriptions  O A current Drug Free Workplace policy statement on file signed by the employee? [R. H. Section 2152]			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current job duties/descriptions  O A current Drug Free Workplace policy statement on file signed by the employee? [R. H. Section 2152]  O Work hours			
7. •	Does the project staff have access to written personnel policies as required? [R. H. Section 2130]  Do policies include:  O Maintenance of personnel files for all paid and volunteer staff including job applications, salaries, benefits, and current job duties/descriptions  O A current Drug Free Workplace policy statement on file signed by the employee? [R. H. Section 2152]			

Comments: <u>provided a CD upon hire, also available online; obtained copy of Employee Handbook of Personnel Policies.</u>

A.	ADMINISTRATIVE REVIEW (Continued)				
		YES	NO	N/A	
	8. <u>FUNCTIONAL TIMESHEETS</u>				
	<ul> <li>Does the project use functional timesheets for each grant funded position less than 1 FTE? OR Time Study Allocation plan updated</li> </ul>	$\boxtimes$			
	<ul> <li>within the last 2 years? [R. H. Section 11331]</li> <li>Are timesheets (paid staff &amp; volunteer) signed by staff &amp; approved by supervisor? (Review timesheets to ensure they are signed by the staff and supervisor)</li> </ul>				
	Comments: obtained Holly Rockett's functional time sheet. Therapists are doing may hire advocate.	g the role o	f the ad	vocate; s	<u>till</u>
	9. DUTIES OF FINANCIAL OFFICER AND BOOKKEEPER				
	<ul> <li>Are the duties of the financial officer and the bookkeeper separate to ensure no one person has complete authority over a financial transaction?</li> </ul>				
	<ul> <li>Name of individual who approves purchases. <u>Shelly Hance</u></li> <li>Name of individual who writes checks. <u>Ella Bender</u>, accounts payable</li> </ul>				
	Name of individual(s) who signs checks. <u>Shelly and 1 board member</u>				
	10. SOURCE DOCUMENTATION-Fiscal [R. H. Section 11000]				
	<ul> <li>Does the project maintain a record-keeping system which will accurately support costs claimed on Report of Expenditure and Request for Funds (Cal EMA Form 2-201)?</li> </ul>				
	<ul> <li>Does the project maintain an accurate inventory log of equipment purchased with grant funds?</li> </ul>				
	Comments: <u>use MEP-SAGE software, fund accounting system.</u> No equipment; <u>over \$5,000 is reviewed in audit.</u>	have a pro	cess an	d equipm	ent
	11. PROJECT EXPENDITURES				
	<ul> <li>Is the project's expenditure rate commensurate with the elapsed period of the grant?</li> </ul>	$\boxtimes$			
	<ul> <li>Are the project's expenditures being made in accordance with the terms of the Grant Award Agreement?</li> </ul>	$\boxtimes$			
	<ul> <li>Does the project need to submit a Grant Award Modification Request (Cal EMA Form 2-223)?</li> </ul>	$\boxtimes$			
	<ul> <li>Is the project up-to-date with the submission of Cal EMA Form 2-201?</li> </ul>		$\boxtimes$		

Comments: reviewed 201s, general ledger, and receipts from Jan-Mar. 2009; need Modification to move funds from OE to PS. Recipient has not submitted third quarter 201; will submit by next week.

ΑI	OMINISTRATIVE REVIEW (Continued)			
		<u>YES</u>	<u>NO</u>	N/A
12.	MATCH REQUIREMENTS	•		
•	Does the project have a match requirement? Is the project meeting the match requirement? Review the supporting documentation to substantiate cash or in-kind match.			
Con	mments: volunteer outreach person\$10/hr; MFT intern\$30/hr donation; Lice donation.	nsed MI	FT\$40	<u>/hr</u>
13	EEO POLICY			
•	Go over EEO checklist. (Separate document)	$\boxtimes$		
Cor	mments: recipient is in compliance.			

	PROGRAMMATIC REVIEW			
(	GENERAL	<u>YES</u>	<u>NO</u>	N/A
]	. PROGRAM GOALS AND OBJECTIVES			
	<ul> <li>Review the goals and objectives of the program and the programmatic requirements of the Grant Award Agreement. Is the project meeting the program goals and objectives?</li> </ul>	$\boxtimes$		
	<ul> <li>Does the project staff need to submit Cal EMA Form 2-223 to modify their grant objectives?</li> </ul>		$\boxtimes$	
(	Comments: 1.5 FTE therapists			
2	PROGRESS REPORT			
	Discuss and review the programmatic Progress Report requirements.	$\boxtimes$		
(	Comments: 6-month report: A) 67 B) 25 C) 20 D) 2—all on target.			
	s. SOURCE DOCUMENTATION-Programmatic			
	<ul> <li>Is the project maintaining a record keeping and data collection process that will accurately support the project's reported data on the Progress Report form?</li> </ul>	$\boxtimes$		
	Review the project's file system and data collection process.			
(	Comments: paper system, count by hand.			
4	. OPERATIONAL AGREEMENTS			
	<ul> <li>Does the project have current Operational Agreements as required by the Grant Award Agreement?</li> </ul>		$\boxtimes$	
	Comments: outdated, missing CA Coalition for Youth, Workforce Investment Boar Referred to RFA p. 22 for list of required Operational Agreements.	d/Youth	Emplo	oyment.
5	. PROJECT STAFF DUTIES			
	<ul> <li>Interview project staff and discuss their duties and the relationship to the grant. Are employees performing duties as stated in the Grant Award Agreement?</li> </ul>		1	

SUPPLEMENTAL PROGRAMMATIC REVIEW				
Describe "how" staff does these? (Quality)	<b>YES</b>	NO	N/A	
<ol> <li>Does the project provide one-on-one therapeutic services by licensed clinicians? How? If not, explain the therapeutic mode.</li> </ol>	$\boxtimes$			
Comments: 1.5 FTE therapists; interviewed all four therapists and supervisor	quality	service	es provid	led.
Does the project provide information and referral to the local Victim Witness Assistance Center for victim compensation benefits? How?  Comments: provide clients with a referral fact sheet on VW.				
3. Does the project provide information and referral to the local Victim Witness Assistance Center for assistance, advocacy, and support during judicial/legal proceedings? How?				
Comments:				
4. Does the project use volunteers? How? If not, has the project received a volunteer waiver for the current grant award period?				
Comments: discussed creating a time sheet or log for volunteers (completed while activities (not provide counseling to adults for adult's issues; ok to include in ch	e there); ild's ind	clarifi ividual	ed allowa	<u>able</u> s.
<ol><li>Have volunteers completed the required training prior to face-to-face client contact? Review documentation.</li></ol>	$\boxtimes$			
6. Do volunteers complete a sign-in sheet with date, time, activities and signature of CHAT staff?				
Comments:				
Comments.			· · · · · · · · · · · · · · · · · · ·	
7. Does the project staff have documentation supporting the completion of the required background checks?				
o Reference Checks (3)	$\boxtimes$			
<ul> <li>Criminal Background Check (if staff/volunteers have resided in California for less than 3 years, out-of-state criminal history or FBI checks are also required)</li> </ul>	$\boxtimes$			
Department of Motor Vehicle Checks (only required if driving clients)	$\boxtimes$			

Comments: reviewed Holly Rockett's file.

## D. ADDITIONAL COMMENTS:

## Strengths:

I visited Amador-Tuolumne Community Action Agency's office in Jackson, which houses administrative and clinical functions, and interviewed CHAT staff during the two-day visit. This is the fifth year of operating the CHAT Program. I appreciated seeing your agency for the first time and getting to know staff. Staff appeared enthusiastic, commitment to the agency, and competent in their duties. The office is large and there is a variety of services offered. During the site visit the following strengths were verified:

- Staff reported agency management is very supportive; therapists share resources, feel valued and appreciated.
- Strong agency collaborations (Voices for Families); have relationships with providers, discuss referrals.
- Multiple services are offered within this Family Resource Center: employ a strengths perspective.
- Thorough personnel department processes to prevent potential litigation: hiring procedure, checklist, subsequent DOJ checks, DMV pull notice, and maintenance of personnel files (no findings).
- Inviting children's therapy rooms: large space, kid-friendly, creative, good amount of supplies and materials.
- Quality clinical services: provide clear and detailed rights statement, complaint procedure; excellent ideas and strengths included in progress notes; received grant for PCIT training.

### Issues to Address:

The following numbers pertain to the above areas of the performance assessment and need to be corrected. Please submit the required documents or your agency's plan to correct the issues by **October 15, 2009**. Overall, the **Programmatic Review** appears to be satisfactory. There are three programmatic issues that need to be addressed:

- Several Operational Agreements (OAs) are missing (Program 4; outdated) or have end dates missing; since the agency has good working relationships with community agencies and this is the end of the grant period obtain required OAs for the 2009/10 grant year beginning 10/1/09. Provide copies of all OAs.
- The current system for summarizing service data is done by hand (Program 3); suggested the agency obtain or develop a system for summarizing service data to ease in reporting to Cal EMA. Agency will be working with Mark and Cathy (IT), who created an Excel program for other parts of the agency. No action is needed since this is not out of compliance. The agency is receiving a software called ASIST which will help in compiling data. We discussed the need for confidentiality for therapy clients and use of passwords to only allow therapeutic staff into client files on the computer database.
- There is no consistent policy for periodic evaluation of client progress (Program Supplemental 1, see RFA for requirements) in treatment using assessment measures (must be minimum intake/assessment, every 6 months, and at termination). Describe your plan to address this in the correction letter.
- After reviewing three client redacted files, the diagnosis and treatment plan is not clearly and consistently
  documented among therapist (included in notes but not on formal treatment plan; should use DSM
  number for diagnosis; see RFA). Goals are general; should also include activities to reach the goal,
  timeline, and treatment modalities utilized. The TheraScribe Treatment Planner book you own has a
  computer disk with treatment plans. Describe your plan to address this in the correction letter.

Overall, the **Administrative Review** appears to be satisfactory. There are two administrative issues that need to be addressed:

- Suggestion for Fiscal Department: there are columns for current month expenditures and year to date, but no column for the CHAT budgeted amounts. You may want to add this so you can monitor expenditures. Cost line items go by agency line items and not exact language of CHAT budget line items (may want to make them consistent). No action needed; only a suggestion.
- As of August 2009 only the first two quarters have been billed for (Admin. 11); accidentally overlooked submitting 3<sup>rd</sup> quarter (April-June 2009); will submit next week (2-201 received on 8/18). Completed.
- There was no volunteer time sheet to capture hours for match (Admin 8, 10, 12), but this was corrected prior to the end of the site visit. No action needed; corrected.
- A modification needs to be submitted prior to 9/14/09 to address the movement of funds in Personal Services from the deleted positions to Operating Expenses (consultant). If the training cannot be arranged we discussed using the funds to purchase a laptop computer, printer, and digital camera.

## The following suggestions were made by your therapeutic staff to improve CHAT services (wish list):

- Add one additional therapy room.
- Pay therapist interns.
- Have staff or volunteers to transport clients to therapy appointments since some families don't have transportation or funds to drive 30 minutes to the Jackson office. I realize you have considered having therapy offices in outlying areas of the county.
- Have staff or advocate to assist clients in applying for Victim Compensation Program funds.
- Digital camera and printer to print pictures of client's artwork and sandtray.
- Laptop computer for part-time consultant therapists to use in documenting services/progress notes.
- Training on the DSM/diagnoses.
- Although there are occasional (quarterly) meetings for all therapists, therapists would like more
  opportunities to share cases, discuss treatment ideas and share resources.

#### Technical Assistance Provided:

- Suggested program and fiscal staff check 201s quarterly, then in July or August, to monitor spending to date in order to ensure all funds are spent by 9/30.
- Discussed how to complete a budget modification and to have staff meet regularly to discuss spending and how to spend all funds by 9/30.
- Encouraged clinical staff to read the Request for Application, psychotherapy section, in the plan and implementation section to better understand Cal EMA's requirements.
- Discussed how to write progress notes with appropriate language to ensure services are allowable. (At-risk, prevention, parenting class, family treatment, or including the offending parent in therapy are not CHAT Program allowable costs).
- Discussed how to note assessment when child has another source of funding but cannot obtain mental health services in a timely manner. Discussed how to transfer child to another funding source with the same therapist.

## **Technical Assistance Continued**

- Emphasized children receiving group therapy must have symptoms correlating to abuse and not behavioral issues or at-risk for abuse. This is why an intake is essential.
- Discussed innovative ideas to assist clients: add transportation line item to provide vouchers for child clients who cannot get to therapy; horse/animal therapy; and therapeutic gardening.
- Clarified that project only needs one volunteer during the year, and not necessarily 1 FTE.
- Will contact Denise Combs and provide therapist contact information in Crescent City for a client who is moving there.